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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

AARON SENNE, *et al.*,

Plaintiffs,

v.

OFFICE OF THE COMMISSIONER OF
BASEBALL, and unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, *et al.*

Defendants.

Case No. 3:14-cv-00608 JCS (consolidated
with 3:14-cv-03289-JCS)

**DECLARATION OF AMANDA PARK,
PAYROLL MANAGER, CHICAGO CUBS
BASEBALL CLUB, LLC**

1 I, Amanda Park, declare as follows:

2 1. I am employed as the Finance and Accounting Manager and served as the Payroll
3 manager for Chicago Cubs Baseball Club, LLC (d/b/a "Chicago Cubs"), a Major League Baseball
4 Club (the "Chicago Cubs" or the "Club"). As the Payroll manager, my responsibilities included
5 overseeing payroll for minor league players. I have personal knowledge of the facts contained in
6 this declaration, and have provided the information below based on my review of certain
7 documents and information. If called to testify, I could and would testify competently thereto.

8 2. I reviewed the payroll records that the Club has produced in connection with this
9 action (bearing Bates Numbers CHC0032691 – CHC0032692), and it is my understanding that
10 such records were kept by the Club in the normal course of business.

11 3. In the produced payroll records referenced in Paragraph 2 above, the names of
12 certain minor league players were replaced with eBis identifiers. All such players signed a Minor
13 League Uniform Player's Contract ("UPC") to play minor league baseball for the Club, and the
14 UPCs reflect the salary rate to be paid to such players during the championship season. It is the
15 Club's practice to pay all players in accordance with their UPCs, and the records of their salary
16 payments are reflected on the payroll records produced by the Club and referenced in Paragraph 2
17 above.

18 4. Based on my review of the payroll records referenced in Paragraph 2 above, all
19 minor league baseball players assigned to a domestic affiliate who played for the Club during the
20 2018 and/or 2019 championship seasons were compensated at a rate of at least two-hundred and
21 ninety dollars (\$290) per week during the championship season.

22 5. In 2020, due to the COVID-19 pandemic, no minor league championship season
23 was held. However, the Club compensated all minor league baseball players assigned to a
24 domestic affiliate in 2020 who were signed to UPCs with the Club in 2020 with an allowance of at
25 least four hundred dollars (\$400) per week, subject to a few limited exceptions, during the period
26 that would have comprised the 2020 championship season.

27
28 **DECLARATION OF AMANDA PARK - Case No. 3:14-cv-00608 JCS (consolidated with 3:14-cv-03289-JCS)**

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of October, 2021.

Amanda Park
AMANDA PARK